

**Before the
Federal Communications Commission
Washington, D.C.**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
Universal Service Reform – Mobility Fund)	WT Docket No. 10-208
)	
)	

**COMMENTS
OF THE MISSISSIPPI PUBLIC SERVICE COMMISSION**

The Mississippi Public Service Commission (“MPSC”) respectfully submits comments to the Federal Communications Commission (“FCC” or “Commission”) in response to the Further Inquiry into Issues Related to Mobility Fund Phase II. The MPSC appreciates the Commission’s intent to seek input and further comments on a limited number of specific issues relating to the implementation of Phase II of the Mobility Fund.¹

1. Identifying Areas Eligible for Support

In identifying areas eligible for support, the Commission is seeking comment on using the Mosaik database as many previous commenters have expressed concern with its accuracy.² Although no database will be 100% accurate when determining eligible areas, the MPSC suggests that the Commission seek input from states that have used programs such as the “Zap the Gap” to identify areas lacking coverage. Zap the Gap, a multi-state initiative, was launched in Mississippi in August 2009 as a program to identify areas with

¹ FCC Public Notice (“Public Notice”) DA 12-1853 dated November 27, 2012 – Further Inquiry into Issues Related to Mobility Fund Phase II.

² See Blooston Rural Carriers Comments at 18; see also Universal Service for American Coalition Comments at 20-21 (Universal Service for American Coalition proposed an indefinite challenge process (as opposed to the limited timeframe allowed in Phase I) that would correct inaccuracies in the data), and Alaska Communications Systems Group, Inc. Comments at 17-18 (interested parties should be given an opportunity to suggest additions to the list of eligible areas), and Public Notice footnote 10.

deficient wireless coverage. Data is collected and then it is provided to the wireless companies. Since its inception in Mississippi, over 3,500 Zap the Gap consumer complaints have been filed. The campaign has been used to bring attention to the areas needing service or improved coverage. The eligible telecommunications companies (“ETCs”) have used the Zap the Gap data along with their own criteria to target needed coverage areas, and have filed their ETC plans accordingly, indicating improvements for the determined areas. Exhibit 1, attached, shows the complaints received in Mississippi by county. The data can be extracted by town, as well, to identify communities with the most complaints and to better target planned improvements. The MPSC feels that this data has been very useful to ensure that all the consumers who lack coverage have a mechanism to be heard and to voice their concerns. The MPSC suggests that the Commission use processes such as Zap the Gap to complement its resources in identifying unserved areas. Also, the MPSC asks that the Commission provide opportunities for states to assist in identifying gaps of coverage within their borders before releasing the final areas for Mobility Fund Phase II auction. The MPSC feels that the Commission should use input from the states for areas that may be challenged as served or unserved. Also, census blocks lacking 100% service should be considered underserved.

2. Prioritizing Areas Eligible for Support

The Commission is requesting comments regarding prioritizing areas eligible for support. The MPSC supports the Commission in its desire to rank areas that lack current generation (3G) service, poverty level, and no coverage. Mississippi is ranked as one of the highest poverty level states in the nation according to 2011 statistics of the U. S.

Census Bureau.³ Providers need assistance in high poverty areas so that infrastructure to these citizens is more affordable. Many of the low-income consumers depend on Lifeline assistance and participate in wireless prepaid service as their primary technological method for communication. Many low-income prepaid wireless ETCs resell services from high cost ETC providers and thus the detriment of coverage areas affect their customers indirectly.

3. Accountability and Oversight

The Commission is seeking comment on accountability and oversight in regard to support being tied to completion of certain milestones, disbursed on a regular recurring basis, or some combination of both. The MPSC reviews ETCs' annual reporting requirements filings when evaluating re-certification each year. The ETCs must report how they determined which areas to target for improvements and new sites. Zap the Gap data, provided to them by the MPSC, is among the criteria that ETCs must utilize when making these determinations. The ETCs provide specific data to indicate where equipment is located to accommodate an on-site visit for facility verification. The MPSC recommends that the Commission require in its annual reporting 1) auditable information, which would include the physical addresses of new equipment, 2) documentation of the accomplishment of certain milestones, and 3) projections for the upcoming year. The MPSC feels that disbursements should be made on a regular recurring basis so providers may continue improvements without interruption. However, auditable safeguards should be employed for accountability, such as mid-year or quarterly status reports.

³ See <http://money.cnn.com/2012/09/20/news/economy/income-states-poverty/index.html>.

4. Summary

The MPSC appreciates the opportunity to file these comments on Mobility Fund Phase II. We believe that states play a critical role in assisting the FCC with identifying specific areas within their borders that lack adequate wireless coverage. Cell phone service has become an important factor in the safety and quality of life of all consumers. Mississippi ranks among the top states with wireless-only households, indicating that many Mississippians are dependent upon their cell phones for primary communications.⁴ As more and more households in the United States adopt wireless only technology for their choices for voice and data, it is imperative that the states and the FCC coordinate efforts to develop strategies that every citizen has an opportunity to enjoy the benefits of robust and adequate wireless coverage.

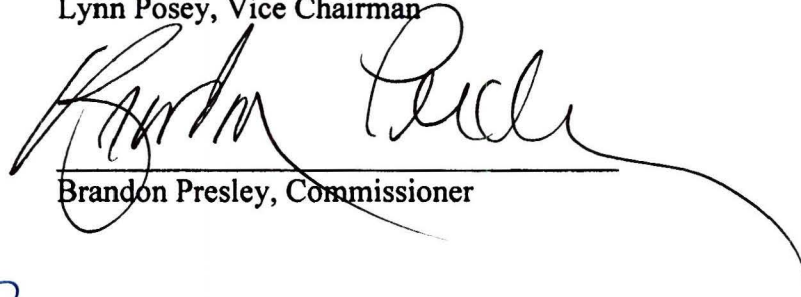
Respectfully Submitted,

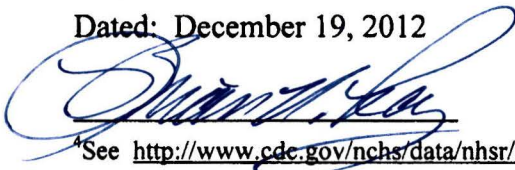
MISSISSIPPI PUBLIC SERVICE COMMISSION




Leonard Bentz, Chairman


Lynn Posey, Vice Chairman


Brandon Presley, Commissioner

Dated: December 19, 2012


⁴See <http://www.cdc.gov/nchs/data/nhsr/nhsr039.pdf>.

Mississippi Public Service Commission

Zap the Gap Data Collection

Exhibit 1

Period: August, 2009 - December 5, 2012

Comments filed with the Federal Communications Commission

Regarding WC Docket No. 10-90 and WT Docket No. 10-209

County	Number of Customer Complaints Received
Adams	7
Alcorn	125
Amite	3
Attala	99
Benton	57
Bolivar	2
Calhoun	53
Carroll	22
Chickasaw	42
Choctaw	21
Claiborne	2
Clarke	3
Clay	24
Copiah	5
Desoto	41
Forrest	2
Franklin	4
George	2
Grenada	71
Hancock	1
Harrison	2
Hinds	10
Holmes	8
Itawamba	231
Jackson	1
Jasper	1
Jefferson	2
Jefferson Davis	2
Jones	2
Lafayette	189
Lamar	2
Lauderdale	1
Lawrence	5

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County	Number of Customer Complaints Received
Leake	4
Lee	196
Leflore	4
Lincoln	6
Lowndes	15
Madison	1
Marion	1
Marshall	74
Monroe	246
Montgomery	7
Neshoba	2
Newton	7
Oktibbeha	44
Panola	53
Pearl River	14
Perry	1
Pontotoc	89
Prentiss	573
Quitman	8
Rankin	12
Scott	3
Simpson	4
Simpson	1
Smith	3
Sunflower	5
Tallahatchie	16
Tate	30
Tippah	402
Tishomingo	271
Tunica	14
Union	94
Walthall	6
Warren	5
Wayne	2
Webster	53
Wilkinson	1

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County	Number of Customer Complaints Received
Winston	10
Yalobusha	93
Yazoo	3
No County	179
Total	3594